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September 22, 2023

Via ECF

Hon. Paul A. Engelmayer, U.S.D.J. (S.D.N.Y.)

Re: *Donoghue et. al., v. Tannenbaum et. al.*, No. 21-CV-4770 (PAE)

Joint Request for 1-Week Extension of Deadline to File Revised Case Management Plan

Your Honor:

At the conference held earlier this week, on September 19, 2023, the parties were ordered to discuss the Court's rulings on the discovery issues addressed at the conference and to submit a revised Case Management Plan by the end of the day today.

The parties conferred earlier today regarding the Court's guidance, and Oaktree's counsel informed the parties that Oaktree requires an additional week to be able to estimate the timing for production of documents and the anticipated production volume.

As discussed at the conference, the depositions that Plaintiffs intend to take will proceed after Plaintiffs' counsel has an opportunity to review Oaktree's document production. Once Oaktree provides an estimated production date, Plaintiffs will propose dates for the depositions permitted by the Court.

Accordingly, with the consent of all parties, I respectfully request a 1-week extension of the deadline set by the Court for the parties to submit their proposed revised CMP for the balance of the discovery in this case and any summary judgment motions to be filed.

Respectfully submitted,

/s/ Miriam Tauber

Miriam Tauber, *Attorney for Plaintiffs*

Granted. The parties have until September 29, 2023 to submit a revised Case Management Plan.

SO ORDERED.



Dated: September 25, 2023
New York, New York

PAUL A. ENGELMAYER
United States District Judge